

PAUL J. FISHMAN
United States Attorney
District of New Jersey
BRIAN J. BILHEIMER
Special Assistant
United States Attorney
BB1056
One Newark Center, Suite 1500
Newark, New Jersey 07102-5224
Telephone: (973) 645-3312

Attorneys for the United States of America

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

In re:)	
)	
LIFT TECH ELEVATOR)	Case No. 09-40244
SERVICE, LLC)	Chapter 11 (MS)
)	
Debtor.)	Hearing Date: 4/26/10
)	10:00 AM
)	Judge Stern
)	Oral Argument Requested

TO:

Shmuel Klein
Law Office of Shmuel Klein
113 Cedarhill Ave.
Mahwah, NJ 07430

United States Trustee
One Newark Center
Suite 2100
Newark, New Jersey 07102

AND TO ALL SECURED CREDITORS:

NOTICE OF MOTION OF THE UNITED STATES OF
AMERICA'S MOTION TO DENY USE OF CASH COLLATERAL
OR, ALTERNATIVELY, FOR ADEQUATE PROTECTION

Please take notice that the United States of America,
Internal Revenue Service, by and through its attorney, Paul J.

Fishman, United States Attorney for the District of New Jersey, will move before the Honorable Morris Stern, Judge in Bankruptcy, on the 26th day of April, at 10:00 AM, at the United States Bankruptcy Court, District of New Jersey, Martin Luther King, Jr. Federal Building, 50 Walnut Street, Newark, New Jersey 07102, for an Order Denying Use of Cash Collateral or, alternatively, for an Order of Adequate Protection.

It does not appear that this motion will give rise to novel or complex issues of law; accordingly, no brief is necessary.

PAUL J. FISHMAN
United States Attorney

By: /s/ Brian J. Bilheimer
BRIAN J. BILHEIMER
Special Assistant
United States Attorney